

Privacy Notice for Graduation Ceremonies 2022 of the University of Winchester

version for www.winchester.ac.uk

This privacy notice relates to the University of Winchester's 2022 graduation ceremonies. It will explain what type of information the University will collect from its students and their guests, how this information is collected, why it is collected, and what the University will do with this information, including how it is stored.

This privacy notice will also detail the lawful bases under GDPR the University is relying on to process this information, the data rights of the individuals whose data is being processed, and who to contact at the University and externally if these individuals have queries.

1. What type of information the University has?

- 1.1. For the purposes of the 2022 Graduation Ceremony, the University will need to collect and process a limited amount of personal data on:
 - (a) Graduating students – the University will already have most of this information on file, but some personal data may have changed and be updated etc.; and
 - (b) The guests of graduating students who are attending the 2022 Graduation Ceremony
- 1.2. the University will also need to collect and process information on any additional support required by students and/or their guests on the day; for example, if a student or guest needs additional mobility support. This information is provided so that the University can deliver the best possible service at the ceremony and would be volunteered by the student/guest either at registration or via direct contact with the graduation team.
- 1.3. To ensure the continuing safety of our students, guests and staff we *may* also require all attendees to confirm that they do not have Covid-19. This could include confirmation of a recent negative test result, or vaccine, or completion of a health declaration form to state that you have no symptoms. We may be required to share names and contact information of attendees with Public Health England for the purposes of track and trace.

2. How the University gets the information and why the University has it?

- 2.1. Most of the personal data the University processes for its graduation ceremonies has been and is provided to it directly by the graduating students. The information is taken from student records systems and/or provided directly to the graduation team through registration or email/phone contact.
- 2.2. The University need this data to:
 - (a) Share general updates and practical information about the University's 2022 Graduation ceremony
 - (b) Process student awards and produce degree certificates and transcripts
 - (c) Confirm attendance at graduation and release tickets
 - (d) Create and print the graduation programme for students and guests to use at graduation
 - (e) Enable the smooth running of the graduation ceremonies, including ensuring the graduation ceremonies are accessible for all students/guests who wish to attend
 - (f) Support those students and guests who will require a visa to attend graduation
 - (g) Live stream the ceremonies on the University website and in the Winchester Guildhall (or similar appropriate venue) for students, their guests, and University staff who are unable to attend
 - (h) Promote the university using publicity photographs (consent will be requested for individual or small group shots)
 - (i) Keep a record of all students awarded in an academic year for records
 - (j) Complying with 'legal obligations' where the University is required to provide personal data, for example a subject access request under UK GDPR.
 - (k) Celebrate the success of our students by printing names of graduates in the local newspaper (only for students who consent to this)
 - (l) Contact you in the future about alumni news, events and fundraising ((the student can opt in for this at registration)

- (m) Contact you in the future about careers support (the student can opt in for this at registration)

3. What the University does with the information it has

- 3.1. The University uses the information that you have given us to organise and deliver the Graduation Ceremony 2022.
- 3.2. The University will share a limited amount of necessary personal data with:
 - 3.2.1. The printing company Hague Group (<https://www.hague-group.com/>) in order them to produce degree certificates.
 - 3.2.2. The printing company Culverlands Press, (Winnall Valley Road, Winnall, Winchester SO23 0LN) in order to produce the graduation programme.
 - 3.2.3. The external gown hire company J. Wippel & Co (<https://www.wippellgownhire.co.uk/>) to enable gown hire.
 - 3.2.4. Marston Events (<https://www.yourgraduation.co.uk/index.php>) to enable photography and ticketing purchases to be made.
 - 3.2.5. First Sight Media (<https://www.iamagraduate.com>) who are filming the Graduation Ceremony 2022 and producing DVDs.
- 3.3. The university may be required to share a limited amount of necessary personal data with Public Health England for the purpose of Covid-19 track and trace.

4. How the University stores your information.

- 4.1. Personal data and any sensitive personal data will be kept for no longer than necessary, and these decisions will be made in line with legal requirements, relevant University policies and considering relevant best practices.

5. Lawful Bases for Processing

- 5.1. Under the General Data Protection Regulation (GDPR), the 'lawful bases' the University relies on for processing the personal data are:
 - (a) Your 'Consent' - you can remove your consent at any time where your personal data is processed for a processing purpose related to this lawful basis. You can do this by contacting email: graduation@winchester.ac.uk
 - (b) The University has a 'legitimate interest' - for example here in relation to the filming of the ceremony, which is also streamed 'live' on the University's website (and is available for a month afterwards on the website) and there

may also be a separate screening in Winchester Guildhall (or similar appropriate venue)

- (c) The University need it to perform a 'Public task' (as the University is designated as a 'public authority' in law) in accordance with paragraph 5.4 of the University's [Articles of Association](#); and
- (d) The University have a 'legal obligation'.

5.2. Where the University has a 'legitimate interest' in processing the personal data by filming and live streaming the Graduation Ceremony, it relies upon the generally accepted three-part legitimate interest assessment for this lawful basis¹.

a) Purpose test

The data will enable current, and future students of the University and other interested parties and stakeholders, including future applicants, to access this special event and ceremony, which they may have otherwise been unable to attend. Some of the data will be used to promote future graduation ceremonies to the University's current students as a beneficial activity via social media.

Under this test, in terms of what would the impact be if the University could not go ahead with the processing here? It would reduce the University's ability to effectively promote future ceremonies, leading to a diminished attendance, with students less likely to be able to enjoy an occasion which is traditionally regarded as the celebration of their time at University and one which they have worked hard to achieve.

b) Necessity test

Will this processing help you achieve your purpose? Yes, it ensures the best level of attendance for the event.

Is the processing proportionate to that purpose? Yes, it is limited to names, other limited personal data and photography/videography.

Can you achieve the same purpose without the processing? No, the photography and videography are integral to effective promotion, and the names and other limited personal data are essential for organising the event and making it accessible for both graduating students and their guests.

¹ Further information on the legitimate interest test is available here: [Legitimate interests | ICO](#)

Can you achieve the same purpose by processing less data, or by processing the data in another more obvious or less intrusive way? No.

c) Balancing test

Is the data about people in their personal or professional capacity? Data (images) will depict students in their academic capacity.

What is the nature of the relationship and how have you used data in the past? They are University of Winchester students, and their personal information will have been used for many administrative purposes for the duration of their studies.

Do you have any evidence about expectations? Yes, from historical attitudes of students at similar events in the past.

Are there any other factors in these circumstances that mean they would or would not expect this type of processing in particular? All those in attendance would reasonably expect photos and videos to be taken by the University.

For public health reasons we will be adhering to the latest government guidance to ensure a Covid Safe event, therefore live transmission of the event will be even more important to our graduates, as travel restrictions and social distancing may still be in effect

5.3. In certain specific circumstances, the University may also process a limited amount of special category data, in line with ICO guidance². In practical terms for the Graduation Ceremony, this would most likely be if students and/or their guests have an additional need which would have an impact upon their attendance. For example, if a student or guest needs additional mobility support. This information is provided so that the University can deliver the best possible service at the ceremony and would be volunteered by the student/guest either at registration or via direct contact with the graduation team. If such personal data supplied for the Graduation Ceremony 2022 is health related, the University would be processing this so called 'special category data' (sensitive personal data) under Article 9(2)(a) of the GDPR which relates to 'explicit consent'.

² Further information on Special Category Data can be found here: [Special category data | ICO](#)

6. Your data protection rights

- 6.1. Under data protection law, there are a number of potential rights available to you. More information on these can be found at <https://ico.org.uk/>
- 6.2. These rights though depend on which 'lawful basis/bases' your personal data is processed under for a particular 'processing purpose':
- a) If 'consent' has been used as the lawful basis for a particular 'processing purpose', there is a right to withdraw consent (if applicable).
 - b) Where 'legitimate interests' has been used as the lawful basis for a particular 'processing purpose', you have the 'right to object'.
 - c) Where your personal data is being processed under the 'lawful basis' of 'Public task', you have the 'right to object'; and
 - d) Where the University have a 'legal obligation' to process your personal data, you have no right to erasure, nor right to data portability nor right to object.

7. Contact details:

If you have any questions about how the University uses your data, to enact your data protection rights or if you are unhappy with how the University has used your data you can raise this with the University Data Protection Officer.

The University of Winchester,
Winchester, Hampshire
SO224NR
United Kingdom

[Tel: +44 \(0\) 1962 841515](tel:+441962841515)

Fax: +44 (0) 1962 842280

The University's Data Protection Officer
is:

Stephen Dowell,

The University of Winchester,
Winchester, Hampshire
SO22 4NR.

United Kingdom.

Tel: 01962 827217

Email: Stephen.Dowell@winchester.ac.uk

External to the University

If you are unhappy with how the University has used your data, you may raise this with the Information Commissioner's Office (ICO)

Their address is:

Information Commissioner's Office

Wycliffe House

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113.

<https://ico.org.uk/global/contact-us/>